

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Former Federal Mogul Site - Removal Polrep
Initial Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region III

Subject: POLREP #1
Initial Polrep
Former Federal Mogul Site

Weatherly, PA

To: R3 RRC, EPA Region 3

From: Dominic Ventura, On Scene Coordinator

Date: 6/9/2020

Reporting Period:

1. Introduction

1.1 Background

Site Number:	F303	Contract Number:	
D.O. Number:		Action Memo Date:	
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:		Incident Category:	Removal Assessment
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:		Start Date:	
Demob Date:		Completion Date:	
CERCLIS ID:		RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category
Removal Assessment

1.1.2 Site Description

The approximately 12.5 acre site is situated in a primarily residential area and is bordered to the east by Hazle Creek. The property was historically used for the manufacture of various electric/electronics products. The site is currently being redeveloped by the Borough of Weatherly for use as a municipal building. One of Weatherly Borough's water supply wells (Well No. 3) is located approximately 150 feet southeast of the site.

1.1.2.1 Location

The site is located at 75 West Main Street in Weatherly, Carbon County, PA.

1.1.2.2 Description of Threat

A Removal site evaluation is being conducted to determine whether known trichloroethylene (TCE) and tetrachloroethylene (PCE) groundwater contamination at the site and potential soil contamination may pose a threat to human health which could warrant a CERCLA Removal Action.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

A resident of Weatherly Borough who lives in close proximity to the site contacted EPA in June 2018 and expressed concerns that contamination at the site may present a threat to the surrounding community. The resident communicated his concerns to the OSC and EPA CIC through numerous phone calls, text messages and emails. The resident submitted a written summary of his concerns on March 20, 2019 and later submitted supporting documentation.

A site remediation was conducted by Federal Mogul Corporation (Federal Mogul) at the property from approximately 1991 - 2001 in accordance with the Pennsylvania Land Recycling and Environmental Remediation Standards Act (Act 2). Pennsylvania Department of Environmental Protection (PADEP) provided the OSC a report entitled Remedial Investigation and Final Report, Former Champion Aviation Products Facility, February 19, 2002. The report was prepared by Environmental Strategies Corporation (ESC) for Federal Mogul and was submitted to PADEP. PADEP also provided the OSC the previous 4 years of Volatile Organic Compounds (VOC) analytical results from Borough Well No. 3.

According to the ESC report, the property was used for manufacturing purposes since 1889. It was operated as a silk mill until 1943. From 1944 - 1963 the facility was owned by Tung-Sol and was used to manufacture cathode ray tubes and incandescent light bulbs. The facility went through several ownership changes from 1966 - 1985, and in 1985 was bought by Cooper Industries. Federal Mogul acquired Cooper Industries in 1998. From 1979 until the facility ceased operations in 1998, it was used to manufacture various aviation components, including digital displays and power converters. In 1990, TCE was detected in Borough Well No. 3. at 18 parts per billion (18 ppb). Subsequent assessment activities conducted by ESC revealed significant TCE and PCE contamination in groundwater at the site.

As part of a settlement agreement between Cooper Industries and the Borough of Weatherly, an air stripper

was installed on Well No. 3 to remove chlorinated compounds from the water (still active). A groundwater containment system was installed and operated on the site from 1991 to 2001 to reduce TCE and PCE contamination in groundwater. TCE and PCE contaminated glass piles and soil was removed from the site. The ESC report showed that the groundwater water treatment system was effective at substantially decreasing PCE and TCE contaminant levels at the site. However, TCE and PCE were still detected in groundwater samples collected from site monitoring wells at concentrations greater than Act 2 standards after completion of treatment.

After reviewing the residents concerns, the 2002 ESC report, and available sample results for Well No. 3 the OSC determined that the following should be considered as part of a site evaluation: 1) threat posed by the presence of known groundwater contamination at the site; 2) potential impact to municipal water supplies; 3) potential for metals contamination at the site; and 4) potential for vapor intrusion of surrounding properties.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

Site assessment activities were conducted at the site between November 2019 and January 2020 to determine whether known TCE and PCE groundwater contamination at the site pose a threat to human health either by impacting the local water supply or due to potential vapor intrusion to surrounding residential homes and buildings. Additionally, surface soils at the site were evaluated for potential heavy metals contamination. The April 24, 2020 Trip Report prepared by Weston Solutions summarizes sampling activities and analytical results.

On November 20, 2019, EPA's START contractor collected 16 surface soil samples from the site. An XRF analyzer was used to screen soils at the site prior to collecting samples. Samples were shipped to a laboratory for TAL metals analysis. One soil sample (SS-09) collected along the edge of the property, adjacent to Hazle creek and large boulders contained lead at a concentration of 2100 parts per million (ppm). This is greater than EPA's Removal Management Level (RML) for residential soils, which is 400 ppm. Three XRF screening results at and near the location of where SS-09 was collected also contained lead at concentrations greater than 1,000 ppm. No other soil samples collected at the property or XRF screening contained any metals that exceeded EPA RMLs. Residential exposure to soil in the area with elevated lead results would likely be very infrequent. The OSC discussed these results with the Borough Supervisor who said that the Borough will further assess the area along the edge of the property where elevated lead concentrations were detected and will confer with PADEP regarding additional cleanup in accordance with PA Act 2.

On January 15 and 16, 2020, START conducted sub-slab soil gas sampling. START installed vapor pin soil gas sampling points in the basements or slab foundations at two residences and an American Legion Post (ALP) near the Federal Mogul site. Samples were collected in summa canisters drawn from sample ports in the residential basement floors and the ALP foundation over a period of 24-hours and were then shipped to laboratory for volatile organic compounds (VOC) analysis. Several VOC compounds were detected in samples including PCE which was detected at 3.9 micrograms per cubic meter (ug/m3) in the sample collected from the American Legion building. 3.9 ug/m3 is less than EPA RML for PCE, which is 130 ug/m3. Neither PCE or TCE were detected in any other soil gas samples. No VOCs were detected in any soil soil gas sample at concentrations greater than EPA RMLs and those detected were at low levels and may be related to the indoor use of common household chemicals or typical laboratory contaminants.

On January 16, 2020 START collected water samples from Borough Well No. 3 both before and after the air stripper. Samples were shipped to a laboratory for VOC and TAL metals analysis. No analyte was detected above EPA RMLs or EPA Maximum Contaminant Levels (MCLs). Neither TCE or PCE were detected above the laboratory quantitation limit in either pre or post treatment samples. The OSC also evaluated data in the 2002 ESL report and 4 years of recent VOC data provided PADEP and it appears that the air stripper is working as intended. The local resident who reported concerns to EPA expressed concern that he had information suggesting that the air stripper was not working for long periods of time. The OSC discussed this concern with the Borough Supervisor, who explained that Well No. 3 is not the primary supply well for the town and only is utilized when there is a high demand for water.

Based on document review, water sampling results from the Well No. 3 and soil gas sub-slab sampling results, there is no apparent pathway for exposure to TCE and PCE at concentrations that would warrant an EPA Removal Action at the site. Lead was detected in surface soil in one lab sample and nearby XRF screening locations at concentrations greater than EPA RMLs. The Borough of Weatherly has agreed to coordinate with PADEP to conduct further assessment and necessary cleanup in accordance with PA Act 2 to address the lead contamination.

2.1.2 Response Actions to Date

No EPA response actions have been initiated.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

The Borough of Weatherly has agreed to conduct further assessment and necessary cleanup of lead contaminated soil identified during EPA's assessment in coordination with PADEP's Act 2 Program. EPA will monitor the progress of the assessment and cleanup to ensure that necessary work is completed.

2.1.4 Progress Metrics

Waste Stream	Medium	Quantity	Manifest #	Treatment	Disposal

2.2 Planning Section

2.2.1 Anticipated Activities

EPA will forward the START trip report and analytical data to the Borough of Weatherly and monitor status of assessment and cleanup activities that Weatherly Boro has agreed to complete in accordance with PADEP's Act 2 program.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
TAT/START	\$56,334.00	\$15,790.78	\$40,543.22	71.97%
Intramural Costs				
Total Site Costs	\$56,334.00	\$15,790.78	\$40,543.22	71.97%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

No information available at this time.

4. Personnel On Site

No information available at this time.

5. Definition of Terms

No information available at this time.

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.